

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
TACOMA DIVISION

IN THE MATTER OF:

Alejandro Calderon

PLANTIFF

Vs.

Linebarger Goggan Blair & Sampson, LLP)

DEFENDANTS

CAUSE NO.

3:22CV5962 DGE

COMPLAINT AND JURY
DEMAND

NATURE OF ACTION

1. Plaintiff, Alejandro Calderon ("Plaintiff") brings this action against Defendants Linebarger Goggan Blair & Sampson, LLP pursuant to the Fair Debt Collection Practices Act ("FDCPA"), 15 U.S.C. § 1692 et seq.
2. Plaintiff seeks to recover monetary damages for Defendants' violations of the FDCPA.

JURISDICTION

1 3. This Court has jurisdiction pursuant to 15 U.S.C. § 1692k(d), and 28 U.S.C. § 1331.

2
3 VENUE

4 4. Venue is proper before this Court pursuant to 28 U.S.C. § 1391(b), where the acts
5 and transactions giving rise to Plaintiff's action occurred in this district, where
6 Plaintiff resides in this district, and where Defendant transacts business.

7 5. Venue is proper in the Western District of Washington State Tacoma Division.

8
9 PARTIES

10 6. The Plaintiff in this lawsuit is Alejandro Calderon, a natural person, who at all
11 relevant times resided in the State of Washington, County of Pierce, and City of
12 Tacoma.

13 7. A Defendant in this lawsuit is Linebarger Goggan Blair & Sampson, LLP, an entity
14 who at all relevant times was engaged, by use of the mails and telephone, in the
15 business of attempting to collect debts, as defined by 15 U.S.C. § 1692a(5).

16 8. The above-named Defendant is "debt collectors" as defined by 15 U.S.C. §
17 1692a(6).

18 9. The above-named Defendants are in the business of collecting debts by using mail
19 other methods to collect consumer debts owed, or are alleged to be owed, to another
20 person or entity.

FACTUAL ALLEGATIONS

10. The “debt” as defined by 15 U.S.C. § 1692 a(5) is an alleged obligation of Plaintiff to pay money arising out of a transaction in which the money, which is the subject of the transaction are primarily for personal purposes.

11. Plaintiff is a “consumer” as defined by 15 U.S.C. § 1692a(3).

12. The debt was in default at the time it was obtained by Defendants.

13. Defendants uses instrumentalities of interstate commerce or the mails in a business the principal purpose of which is the collection of any debts.

14. At a time to be found at discovery and known to Defendants, the alleged debt was assigned or otherwise transferred to the Linebarger Goggan Blair & Sampson, LLP for collection.

15. On February 5, 2022, Plaintiff received a dunning notice from Linebarger Goggan Blair & Sampson, LLP, demanding payment of a debt of \$403.09.

16. In notice the Defendant represented the Original Creditor as Fife Municipal Court.

17. The notice did not contain a statement “THIS COMMUNICATION IS AN ATTEMPT TO COLLECT A DEBT BY A DEBT COLLECTOR”.

18. A true and correct copy of Defendants notice is attached as Exhibit A.

1 19. On February 26, 2022, plaintiff sent a letter to Linebarger Goggan Blair &
2 Sampson, LLP disputing the debt and requesting validation pursuant to FDCPA.

3 20. A true and correct copy of Plaintiffs letter is attached as Exhibit B.

4 21. On March 21, 2022, plaintiff received a response to plaintiff's dispute and request
5 for validation

6 22. A true and correct copy of Defendants response letter is attached as Exhibit C.

7 23. In the response, Defendant stated that the Plaintiff owed \$409.51.

8 24. In the response, Defendant stated that the Plaintiff owed \$12.77.

9 25. In the response, Defendant did not indicate or provide the agreement that created the
10 debt, or that it could expressly charge interest.

11 26. A true and correct copy of Defendants response letter is attached as Exhibit D and
12 E

13 27. Each redlight traffic infractions ticket indicates a fine of \$139.00 for a total \$278.00

14 28. The Defendant did not include a court judgement or how much the plaintiff owes
15 according to any type of generally accepted accounting principles. in their response
16 to the plaintiff's dispute.

17
18
19 COUNT I

VIOLATIONS OF THE FDCPA

29. Plaintiff repeats and re-alleges each factual allegation stated above.

30. Plaintiff alleges, Linebarger Goggan Blair & Sampson, LLP, violated the FDCPA by attempting to collect a debt that has been disputed and has not been validated.

Plaintiff prays for relief and judgment, as follows:

- a. Adjudging that Defendant , Linebarger Goggan Blair & Sampson, LLP, violated the FDCPA § 1692g(b).
- b. Awarding Plaintiff statutory damages, pursuant to 15 U.S.C. § 1692k, in the amount of \$1,000.
- c. Awarding Plaintiff \$150.00 for service fees and \$402 court costs incurred in this action:
- d. Awarding Plaintiff post-judgment interest as may be allowed under the law.
- e. Awarding such other and further relief as the Court may deem just and proper.

COUNT II

VIOLATIONS OF THE FDCPA

32. Plaintiff repeats and re-alleges each factual allegation stated above.

33. Plaintiff alleges, Linebarger Goggan Blair & Sampson, LLP, violated the FDCPA by attempting to charge and collect interest.

Plaintiff prays for relief and judgment, as follows:

- a. Adjudging that Defendant , Linebarger Goggan Blair & Sampson, LLP,
violated the FDCPA § 1692f(1).
- b. Awarding Plaintiff statutory damages, pursuant to 15 U.S.C. § 1692k, in the
amount of \$1,000.
- c. Awarding Plaintiff \$150.00 for service fees and \$402 court costs incurred
in this action.
- d. Awarding Plaintiff post-judgment interest as may be allowed under the law.
- e. Awarding such other and further relief as the Court may deem just and proper.

TRIAL BY JURY

Plaintiff is entitled to and demands a trial by a jury.

Dated December 67, 2022



Alejandro Calderon
1309 E 58th St.
Tacoma, WA 98404

Exhibit “A”

Linebarger Goggan Blair & Sampson, LLP

ATTORNEYS AT LAW
5801 Soundview Drive NW, Suite 50B
Gig Harbor, WA 98335
1(844) 576-4766 Toll-Free

JANUARY 20, 2022

Account # ~~612345~~

ALEJANDRO R CALDERON
1309 E 58TH ST
TACOMA WA 98404-2545

Court ID: RED037154
2 Case(s) Totaling \$403.09

NOTICE OF DELINQUENT COURT FINES

Dear ALEJANDRO R CALDERON:

Our law firm has been hired to represent the below-named court(s) ("Court") to collect unpaid Court fines. Court records indicate that you have an outstanding balance of unpaid fines due the Court. Please take notice that your failure to pay the below-referenced delinquent account(s) may result in the delinquency being reported to Washington Department of Licensing (which could result in the suspension of your driver's license for cases involving criminal traffic offenses, or non-renewal of your vehicle registration for cases involving parking violations); and, for cases involving parking and civil infraction fines, in the assessment of interest of 12% per year on the total amount due on those accounts. Contact the Court if you wish to request an "ability to pay" hearing. You may disregard this notice if you have made payment within the last 10 days.

<u>Court Name</u>	<u>Case #</u>	<u>Assigned Principal</u>	<u>Court Costs (Collection)</u>	<u>Interest</u>	<u>Payments</u>	<u>Current Balance</u>
FIFE MUNICIPAL COURT	RED037154	\$164.00	\$31.16	\$7.25	\$0.00	\$202.41
FIFE MUNICIPAL COURT	RED040933	\$164.00	\$31.16	\$5.52	\$0.00	\$200.68

To make payment, please return the coupon below, along with a check or money order in the amount of \$403.09, made payable to LGBS. If your check is returned unpaid, you will be liable for an administrative fee of \$25.00. To pay by credit card, please call 1(844) 576-4766 or log on to <http://www.lgbswebpayments.com> and use **Client Code WACIFIMFRD** and **Online Payment Number 51368376**.

If you are now a debtor in bankruptcy or if you have been discharged from the above debts through a bankruptcy proceeding, then within 30 days, please provide us at the address at the top of this letter, in writing, the case number and the name of the court in which your bankruptcy case was filed. If for any reason you find the information in this letter to be in error or you disagree with the Court records, you should notify our office immediately. Unless you want an "ability to pay" hearing, please do not call the Court directly, as we have been retained to resolve this matter on its behalf. We have payments options available if you are experiencing financial hardship. Our toll-free telephone number is 1(844) 576-4766.

Linebarger Goggan Blair & Sampson, LLP ("LGBS")

Office Phone-in Hours: Monday through Thursday, 5:00 a.m. to 7:00 p.m., Friday, 5:00 a.m. to 6:00 p.m., and Saturday, 6:00 a.m. to 10:00 a.m. (All times Pacific.)

PLEASE COMPLETE AND DETACH THE REPLY FORM BELOW AND RETURN IN THE ENVELOPE PROVIDED

Linebarger Goggan Blair & Sampson, LLP
PO BOX 659443
SAN ANTONIO TX 78265-9443



Court ID: RED037154
2 Case(s) Totaling \$403.09
Amount Due: \$403.09 as of JANUARY 20, 2022
Amount Enclosed: _____

Make check or money order payable to "LGBS" and include your account number, court number, name, and address.
To pay by credit card, call 1(844) 576-4766 or scan the QR code and use **Client Code WACIFIMFRD** and **Online Payment Number 51368376**.

When you provide a check as payment, you authorize us to either use information from your check to make a one-time electronic fund transfer from your account or to process the payment as a check.

ALEJANDRO R CALDERON
1309 E 58TH ST
TACOMA WA 98404-2545



LGBS, LLP
CLIENT CODE: WACIFIMFRD
PO BOX 702118
SAN ANTONIO TX 78270-2118



Exhibit “B”

Alejandro Calderon
1309 East 58TH Street
Tacoma, WA 98404
2/26/2022

Account # ~~XXXXXXXXXX~~

Linebarger Goggan Blair & Sampson, Llp
5801 Soundview Dr,
Gig Harbor, WA 98335

Linebarger Goggan Blair & Sampson, Llp,

This is not a refusal to pay, but a notice that your claim is disputed. I dispute the creditor's name, balance, any fees or interest that has been added and the fact that you can add any fee or interest to the original balance,

This is a request for validation made pursuant to the Fair Debt Collection Practices Act and Washington's Fair Debt Collection Act.

Please be advised that I am not requesting a "verification" that you have my mailing address, I am requesting a "validation:" that is, competent evidence that I have some contractual obligation to this debt. Please provide me the name of the creditor.

Sincerely,



Alejandro Calderon

Exhibit “C”

LINEBARGER GOGGAN BLAIR & SAMPSON, LLP
ATTORNEYS AT LAW
P.O. Box 702118
San Antonio, TX 78270

March 10, 2022

CALDERON, ALEJANDRO R
1309 E 58TH ST
TACOMA WA 98404
Via Email:

Re: FIFE MUNICIPAL COURT
Case Number(s): RED037154 and RED040933
Account Number(s): ~~555-1234~~ and ~~555-1234~~
Amount Due: \$409.51

Dear CALDERON, ALEJANDRO R

In accordance with our conversation, please find enclosed the attached debt verification that you requested.

If you have any further questions, please contact our office at 1-877-242-9467.

Respectfully,



Jon Boquist
Call Center Manager

This communication is from a debt collector and any information obtained will be used for that purpose .

Exhibit “D”

NOTICE OF RED LIGHT INFRACTION

City of Fife Traffic Safety Enforcement



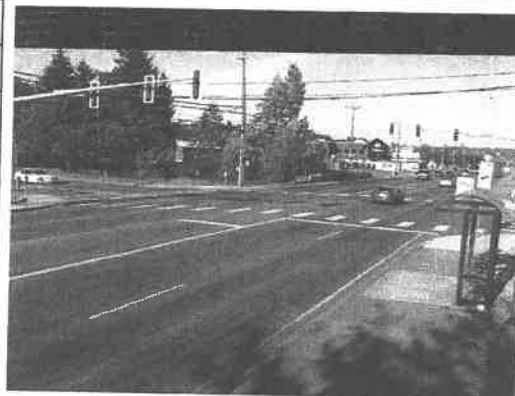
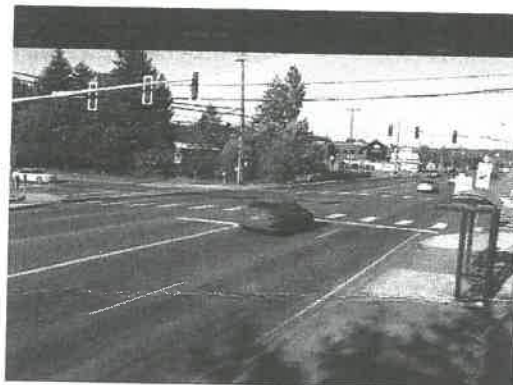
Ticket Number: RED037154
 Plate Number: BYL8997
 Password: 6i3VR7Kx
 View your violation at
www.ZeroFatality.com

ALEJANDRO R CALDERON
 3105 S 47TH ST APT E49
 TACOMA, WA 98409



This ticket will be filed with Fife Municipal Court - 3737 Pacific Highway E, Suite 100, Fife, WA 98424

Violation Date: 06/03/2021	Time: 18:22:10	Fine Amount: \$139	
Location of Infraction: Pacific Hwy EB @ Alexander Ave			
Plate: BYL8997	State: WA	Amber Time: 3.5	Red Light Time: 0.5
Year: 2016	Make: HOND	Model: CIV	Body Style: Color:
Violator: CALDERON, ALEJANDRO R			
Street Address: 3105 S 47TH ST APT E49			
City: TACOMA	State: WA	Zip: 98409	
Registered Owner: CALDERON, ALEJANDRO R			
Street Address: 3105 S 47TH ST APT E49			
City: TACOMA	State: WA	Zip: 98409	
The above listed vehicle registered in your name was photographed failing to stop at a red light, which is in violation of RCW 46.61.050 pursuant to 46.63.170 and Fife Municipal Code 10.60 et seq.			
This notice represents a determination that an infraction has been committed by the person named in the notice and the determination shall be final unless contested as provided in RCW 46.63.060(2)(a). An infraction is a non-criminal offense for which imprisonment may not be imposed as sanction. The penalty for a photo-enforced infraction may include non-renewal of the vehicle registration as per RCW 46.63.060(2)(b).			
DO NOT IGNORE THIS NOTICE: You must respond to this notice on or before 06/26/2021. As registered owner, you are responsible for any additional fees, fines and costs.			
Officer's Certificate: I certify under penalty of perjury under the laws of the State of Washington that there are reasonable grounds/probable cause to believe and do believe that the described vehicle/person was in violation of the above listed ordinance/statute and that the foregoing is true and correct.			
Sworn to or affirmed in Fife, WA by:			
Fife Limited Commission Officer: 	Date: 06/08/2021	Badge: 660	



PAY ONLINE: You may view your violation images and video online and pay your fine at: www.ZeroFatality.com
 Please enter Plate Number and Password provided below to enter the secure website.

Plate Number: BYL8997
 Password: 6i3VR7Kx
 Amount Due: \$139
 Due Date: 06/26/2021
 Violation Number: RED037154



PAY BY PHONE:
 Please call 253-344-4053
 Or 855-873-9711 Mon-Fri. 5 AM to 5 PM (PST)
 Saturday 7 AM to 11 AM (PST)



PAY IN PERSON/MAIL or REQUEST PAYMENT PLAN:
Fife Municipal Court
 3737 Pacific Highway E, Suite 100, Fife, WA 98424
 Mon, Tues, Thurs & Fri 8:30 AM - 4:30 PM (PST)
 Weds. 9:30 AM - 4:30 PM (PST), Tel: 253-922-6635
WE ACCEPT IN PERSON: Cash, Check, Money Order, Visa, MasterCard, AmEx, and Discover
*** DO NOT MAIL CASH *** For proper payment processing include this return stub with ALL mailed payments.

Detach here and return with your payment

PAYMENT OPTIONS:
 You may be able to enter into a payment plan with the Court under RCW 46.63.110(6)

CHECKS PAYABLE TO:
 Fife Municipal Court

TO REQUEST A HEARING:

Please see reverse side
PLEASE NOTE: A convenience fee will be added for all credit card and e-check payments

Exhibit “E”

NOTICE OF RED LIGHT INFRACTION

City of Fife Traffic Safety Enforcement



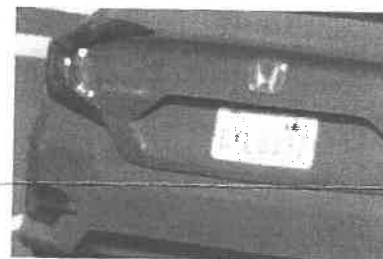
Ticket Number: RED040933
 Plate Number: BYL8997
 Password: tFidR6wH
 View your violation at
www.ZeroFatality.com

ALEJANDRO R CALDERON
 3105 S 47TH ST APT E49
 TACOMA, WA 98409



This ticket will be filed with Fife Municipal Court - 3737 Pacific Highway E, Suite 100, Fife, WA 98424

Violation Date: 06/28/2021		Time: 16:53:30		Fine Amount: \$139	
Location of Infraction: Pacific Hwy EB @ Alexander Ave					
Plate: BYL8997	State: WA	Amber Time: 3.5	Red Light Time: 0.8		
Year: 2016	Make: HOND	Model: CIV	Body Style:	Color:	
Violator: CALDERON, ALEJANDRO R					
Street Address: 3105 S 47TH ST APT E49					
City: TACOMA	State: WA	Zip: 98409			
Registered Owner: CALDERON, ALEJANDRO R					
Street Address: 3105 S 47TH ST APT E49					
City: TACOMA	State: WA	Zip: 98409			
The above listed vehicle registered in your name was photographed failing to stop at a red light, which is in violation of RCW 46.61.050 pursuant to 46.63.170 and Fife Municipal Code 10.60 et seq.					
This notice represents a determination that an infraction has been committed by the person named in the notice and the determination shall be final unless contested as provided in RCW 46.63.060(2)(a). An infraction is a non-criminal offense for which imprisonment may not be imposed as sanction. The penalty for a photo-enforced infraction may include non-renewal of the vehicle registration as per RCW 46.63.060(2)(b).					
DO NOT IGNORE THIS NOTICE: You must respond to this notice on or before 07/26/2021. As registered owner, you are responsible for any additional fees, fines and costs.					
Officer's Certificate: I certify under penalty of perjury under the laws of the State of Washington that there are reasonable grounds/probable cause to believe and do believe that the described vehicle/person was in violation of the above listed ordinance/statute and that the foregoing is true and correct.					
Sworn to or affirmed in Fife, WA by:					
Fife Limited Commission Officer: <i>David B. Chapman</i>		Date: 07/07/2021	Badge: 265		



PAY ONLINE: You may view your violation images and video online and pay your fine at: www.ZeroFatality.com. Please enter Plate Number and Password provided below to enter the secure website.

Plate Number: BYL8997
 Password: tFidR6wH
 Amount Due: \$139
 Due Date: 07/26/2021
 Violation Number: RED040933



PAY BY PHONE:
 Please call 253-344-4053

Or 855-873-9711 Mon-Fri. 5 AM to 5 PM (PST)
 Saturday 7 AM to 11 AM (PST)

PAY IN PERSON/MAIL or REQUEST PAYMENT PLAN:
 Fife Municipal Court

3737 Pacific Highway E, Suite 100, Fife, WA 98424
 Mon, Tues, Thurs & Fri 8:30 AM - 4:30 PM (PST)
 Weds. 9:30 AM - 4:30 PM (PST), Tel: 253-922-6635
WE ACCEPT IN PERSON: Cash, Check, Money Order, Visa, MasterCard, AmEx, and Discover
*** DO NOT MAIL CASH *** For proper payment processing include this return stub with **ALL** mailed payments.



Detach here and return with your payment

PAYMENT OPTIONS:

You may be able to enter into a payment plan with the Court under RCW 46.63.110(6)

CHECKS PAYABLE TO:
 Fife Municipal Court

TO REQUEST A HEARING:

Please see reverse side
PLEASE NOTE: A convenience fee will be added for all credit card and e-check payments

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Alejandro Calderon

(b) County of Residence of First Listed Plaintiff Pierce
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

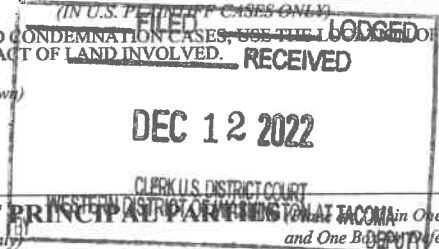
DEFENDANTS

Linebarger Goggan Blair & Sampson, LLP

County of Residence of First Listed Defendant Pierce

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)



II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|---------------------------------------|----------------------------|---|----------------------------|---------------------------------------|
| Citizen of This State | <input checked="" type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input checked="" type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for:

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 INTELLECTUAL PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input checked="" type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement		

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation - Transfer
- ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
12 USC 1692

Brief description of cause:
violation of the FDCPA

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

\$1650 1552.00

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

12-6-2022

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Western District of Washington

Alejandro Calderon

Plaintiff(s)

v.

Linebarger Goggan Blair & Sampson, LLP

Defendant(s)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Linebarger Goggan Blair & Sampson, LLP
5801 Soundview Dr.
Gig Harbor, WA 98335

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are: Alejandro Calderon
1309 E 58th St.
Tacoma, WA 98404
Alexerectors@gmail.com

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

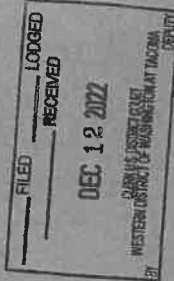
Signature of Clerk or Deputy Clerk

Alejandro Calderon
1309 E 58th St
Tacoma, WA 98404

U.S. POSTAGE PAID
FOR US ENV
TACOMA, WA
PERMIT NO. 100
REGISTRATION NO. 100-00



98402



U.S. District Court Clerk
1717 Pacific Ave Rm 3100
Tacoma, WA 98402

